



**COHEN FORMAN BARONE, LLP**  
AN EXPERIENCED LAW FIRM


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Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 3/15/23

Counsel should be prepared to discuss the circumstances surrounding Ms. Earl's request to change counsel and subsequent withdrawal of that request at the April 4, 2023 status conference.

Re: **United States v. Goddes Earl, et al., 22 CR 142 (VSB)**  
**Adjournment Request**

Dear Honorable J. Vernon S. Broderick,

I am counsel representing the above-named defendant. The government and counsel have engaged in extensive plea discussions and counsel for Ms. Earl has received unequivocal agreement from client that she wishes counsel to continue with his representation.

Consequently, both counsel for Ms. Earl as well as the government jointly and respectfully request that **the appearance currently schedule for Friday, March 17<sup>th</sup> 2023 be adjourned to April 4<sup>th</sup>, 2023** when the other co-defendant's matters will be heard by the Court. If the proposed date for adjournment is not practicable for the Court, a date thereafter is acceptable to both parties.

Respectfully,

//s//David Jason Cohen//s//  
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